

# Exhibit 2

**PATTERSON LAW GROUP, APC**

## Lodestar Calculation

*Buckeye Tree Lodge, et al. v. Expedia, Inc., et al.*

From inception through February 23, 2021

	General Description	Hours	Rate	Lodestar
1.	<b>Pre-Filing Investigation and Tasks:</b> Conduct client and witness meetings and interviews; perform legal research and analysis of claims; review clients' documents; research defendants' practices; perform searches and screen captures of defendants' practices; draft complaint	22.7  18.8  38.6	\$895 (AHG) <sup>1</sup>  \$895 (JRP)  \$750 (EAM)	\$20,316.50  \$16,826.00  \$28,950.00
2.	<b>Pleadings and Legal Research:</b> Oppose two motions to dismiss; draft motion to strike answer; draft motion to intervene; draft amended and consolidated complaints; legal research and analysis of claims and elements of proof	78.3  30.4  78.8  10.7  167	\$895 (AHG)  \$895 (JRP)  \$695 (JMF)  \$750 (EAM)  \$450 (JQ)	\$70,078.50  \$27,208.00  \$54,766.00  \$8,025.00  \$75,150.00
3.	<b>Discovery:</b> Propound and respond to written discovery, including document requests, interrogatories, requests for admissions, and deposition notices as to all defendants; prepare witnesses for depositions; defend depositions; review and analyze documents; take depositions of multiple defense witnesses and third party; serve and respond to subpoenas to third parties; meet and confer regarding discovery; move to compel further responses	525.9  105.7  15.7  9.1  233.7	\$895 (AHG)  \$895 (JRP)  \$695 (JMF)  \$750 (EAM)  \$450 (JQ)	\$470,680.50  \$94,601.50  \$10,911.50  \$6,825.00  \$105,165.00

<sup>1</sup> AHG = Allison H. Goddard; JRP = James R. Patterson; JMF – Jennifer M. French; EAM = Elizabeth A. Mitchell; JQ = Jacquelyn Quinn

	General Description	Hours	Rate	Lodestar
4.	<b><i>Motion for Class Certification:</i></b> Draft motion for class certification and supporting documents; argue motion at hearing	226.7 32.9 77.6	\$895 (AHG) \$895 (JRP) \$450 (JQ)	\$202,896.50 \$29,445.50 \$34,920.00
5.	<b><i>Renewed Motion for Class Certification:</i></b> Draft renewed motion for class certification and supporting documents; argue motion at hearing	122.5 28.5 9.0	\$895 (AHG) \$895 (JRP) \$450 (JQ)	\$109,637.50 \$25,507.50 \$4,050.00
6.	<b><i>Investigation of Expedia's Practices and Correspondence with Class Members:</i></b> Conducted multiple internet searches to assess Expedia's practices and identify hotel properties that were incorrectly listed on Expedia websites; interviewed class members regarding relationship with Expedia and appearance on Expedia websites	38 23.2 10.4 34.5	\$895 (AHG) \$895 (JRP) \$750 (EAM) \$450 (JQ)	\$34,010.00 \$20,764.00 \$7,800.00 \$15,525.00
7.	<b><i>Expert Witnesses:</i></b> Research and interview potential experts; work with expert to develop analyses and reports; prepare for, travel to and from, and defend expert depositions; take depositions of opposing experts	163.9 63.5 29.2 5.2	\$895 (AHG) \$895 (JRP) \$695 (JMF) \$450 (JQ)	\$146,690.50 \$56,832.50 \$20,294.00 \$2,340.00
8.	<b><i>Mediation and Settlement Negotiations:</i></b> Participate in Court-ordered ADR program, including travel to San Francisco for mediation; participate in ongoing settlement negotiations and strategies; prepare for and attend mediations with private mediator at JAMS; prepare for and attend further Court-ordered settlement conference	143.1 102.8 20.5 3.0 3.5	\$895 (AHG) \$895 (JRP) \$695 (JMF) \$750 (EAM) \$450 (JQ)	\$128,074.50 \$92,006.00 \$14,247.50 \$2,250.00 \$1,575.00

